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July 22, 2013

Ms. Nicoletta DiForte
Senior Enforcement Policy Advisor
U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

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RECEIVED

RE: Riverside Industrial Park Superfund Site, Newark, New Jersey
Our File No.: 0017037.0322116

Dear Ms. DiForte:

On behalf of PPG Industries, Inc., this responds to your letter of May 22, 2013 requesting PPG to submit a good faith offer to finance or perform a Remedial Investigation and Feasibility Study ("RI/FS") at the Riverside Industrial Park Superfund Site, Newark, New Jersey ("the Site"), and reimburse EPA for its related oversight costs. This letter constitutes the Good Faith Offer ("GFO") of PPG to fulfill these objectives. By submitting this offer, PPG does not admit any responsibility or liability for any contamination at the Site and reserves all rights and defenses related to the Site.

As a threshold matter, PPG wishes to formally acknowledge the Agency's agreement to extend the period to submit a GFO until July 22, 2013. We appreciate your courtesies in this regard.

With reference to the six GFO components outlined on page 2 of your letter, PPG is willing to enter into negotiations with EPA to finance or perform an RI/FS at the Site under a mutually acceptable administrative order on consent ("AOC"). I understand you will present for PPG's consideration a draft AOC that will contain appropriate statutory protections, including CERCLA contribution protection and a covenant not to sue. PPG will review the draft AOC and provide any changes or comments to EPA.

As EPA is aware, PPG sold its former Newark facility in 1971 and has had no connection to the Site since that time. Information provided by EPA shows that multiple

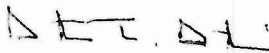
other parties continued to use the Site for a variety of industrial activities after PPG sold its plant operations. Thus, while PPG is agreeable to entering negotiations for funding or performing an RI/FS, PPG expects EPA will take appropriate steps to ensure that other Site PRPs also contribute their fair share. In this regard, PPG understands that the Site is currently comprised of multiple parcels owned by various separate entities/individuals, some of whom are recipients of EPA's May 22 letter. To facilitate the RI/FS, it will be incumbent upon the Agency to take appropriate steps to ensure necessary access.

With respect to PPG's technical and financial wherewithal to undertake the RI/FS, PPG is a publicly traded Fortune 500 company whose Securities and Exchange Commission filings clearly demonstrate sufficient financial resources to fund the RI/FS. Moreover, PPG has well-established technical expertise and first-hand experience in implementing environmental investigations at CERCLA sites in Region II and elsewhere, and will utilize that expertise in undertaking an RI/FS at the Site.

You have also requested the May 22, 2013, letter recipients to indicate their willingness to reimburse EPA for its future oversight costs related to the RI/FS. PPG is willing to pay for its fair share of EPA's lawfully recoverable future oversight costs. However, this GFO is submitted on PPG's behalf only, not the remaining 17 recipients of your letter whom the Agency has identified as potentially responsible parties at the Site. Consistent with EPA enforcement policy, PPG should not reasonably be expected to pay for all of the Agency's oversight costs when other viable PRPs are not participating in this GFO and are available to pay those costs.

Finally, you have asked PPG to designate an individual(s) who will represent PPG in the AOC negotiations for the performance of the RI/FS. Please direct such future communications to my attention.

Very truly yours,


Peter T. Stinson

PTS/rs

cc: William J. Reilly, Jr., Esquire
Mr. Thomas J. Ebbert